



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JANE DOE and RUTH ZERON, on behalf  
of themselves and all similarly situated  
employees and a class of employees,

Plaintiffs,

v.

FEDEX GROUND PACKAGE  
SYSTEM, INC. and ALLIED FACILITY  
CARE, LLC,

Defendants.

No. 3:21-cv-395

District Judge Trauger

Magistrate Judge Newbern

JURY DEMAND

CLASS ACTION

COLLECTIVE ACTION

**NOTICE OF SETTLEMENT BETWEEN PLAINTIFFS AND DEFENDANT ALLIED  
FACILITY CARE, LLC AND SELECTION OF DEADLINE FOR FILING OF  
RULE 23 MOTION FOR CLASS CERTIFICATION**

Named Plaintiffs Jane Doe and Ruth Zeron and the Opt-in Plaintiffs (collectively, “Plaintiffs”) and Defendant Allied Facility Care, LLC (“Allied”), through counsel, hereby inform this Court that they have resolved through an arm’s-length settlement all the claims that Plaintiffs brought against Allied in this litigation. Considering their settlement of all claims, Plaintiffs will not file a motion for conditional certification of a collective action under the Fair Labor Standards Act of 1938, and Allied will not answer Plaintiffs’ Second Amended Complaint (“SAC”).

Plaintiffs and Allied have executed all the settlement documents, but Plaintiffs have not yet received the settlement consideration from Allied. Plaintiffs will move to dismiss Allied from this litigation and will seek to amend the SAC accordingly once they receive the settlement monies from Allied. Plaintiffs and Allied appreciate the Court’s patience while they finalized their agreement and executed the settlement documents, and Plaintiffs anticipate moving to dismiss all claims against Allied by **February 18, 2022**.

This Court previously extended Plaintiffs' deadline to inform this Court of a date certain by which Plaintiffs will file their motion for class certification of their claims against Defendant FedEx Ground Package System, Inc. ("Rule 23 Motion"). [Dkt. 82.] Plaintiffs respectfully request that this Court set their deadline to file a Rule 23 Motion for **July 15, 2022**, and amend the case management order, [Dkt. 41], accordingly.

Date: February 3, 2022

Respectfully submitted,

/s/ N. Chase Teeples

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## CERTIFICATE OF SERVICE

I certify that on February 3, 2022, I filed a copy of this document, *Notice of Settlement Between Plaintiffs and Defendant Allied Facility Care, LLC and Selection of Deadline for Filing Rule 23 Motion for Class Certification*, via the Court's electronic filing system, which sent notice to the following counsel of record:

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